

---

---

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

Kimball Area Public Schools,  
Independent School District No. 739

Case No.: 23-CV-02637 (NEB/LIB)

Plaintiff and Counter Defendant,

V.

**DEFENDANT and COUNTER  
CLAIMANT'S SUPPLEMENTAL  
DISCOVERY DISCLOSURE**

I.R.M. by and through his Parent, L.M.,

Defendant and Counter Claimant.

To: Plaintiff and Counter Defendant's counsel, Elizabeth J. Vieira and William M. Seiler of Squires, Waldspurger & Mace, P.A., 333 South Seventh Street, Suite 2800, Minneapolis, MN 55402

Defendants and Counter Claimants provide the following supplement to their initial disclosure:

- A. The name and, if known, the address and telephone number of each individual likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

Counter Claimants provide the following:

Name	Subject of Information
Elizabeth Reberk Assistance Dogs International 763.331.300	The relationship between I.R.M. and his service animal requires constant connection, in all settings, to increase his independence. A break in this relationship during any time period will impede their bond and reduce the level of independence that I.R.M. is likely to achieve.

	<p>Separation between I.R.M. and his service animal during the school day is likely to lead to irreparable harm and a deterioration in the relationship between the two and, as an extension, the responsiveness and effectiveness in all settings.</p> <p>The service animal requires consistent reinforcement of training and a break in that training can cause skills to lapse.</p> <p>I.R.M.'s preference for his service animal as an assistive technology.</p> <p>The level of adult assistance required for I.R.M. to access Dewey in the educational setting is almost nonexistent.</p> <p>Research supports the conclusion that service dogs promote and improve independence and increase the ability of persons with disabilities to participate in society.</p> <p>The difference between animal and human aides for a child with I.R.M.'s disabilities.</p>
Amelia Burg, Special Education Teacher	Dewey's role in the classroom, the benefits to I.R.M., and the level of intervention and attention required from staff. The extent to which Dewey interferes with staff's ability to perform the essential duties of their job.

Respectfully submitted,

Date: June 27, 2025

/s/ Amy J. Goetz

Amy J. Goetz ID 220243

**SCHOOL LAW CENTER, LLC.**

520 Fifth St. S.

Stillwater, MN 55082

Telephone: (651) 222-6288

[agoetz@schoolawcenter.com](mailto:agoetz@schoolawcenter.com)

**ATTORNEYS FOR DEFENDANTS/  
COUNTERCLAIMANTS**